



11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ARA ARTUNI,  
aka "Ara Harutyunyan,"  
aka "Aro,"  
aka "Araboyi,"  
aka "Arabo,"  
aka "Santos,"  
15 ALEX AGOPIAN,  
aka "Alik,"  
16 DAVIT HAZRYAN,  
aka "Davo,"  
aka "Dav,"  
aka "D,"  
20 VAHAGN STEPANYAN,  
aka "Vee,"  
aka "Vova Titov,"  
aka "Juha Alver,"  
22 aka "Vahan Stephanian,"  
aka "Aso Balvanov,"  
23 ARVIN ALBERT KAZARYAN,  
aka "Artur,"  
aka "Art,"  
24 AREG BEZIK,  
aka "Elvis Narek,"  
fka "Narek Bezikian,"  
26 MANUK MANUKYAN,  
LEVON ARAKELYAN, and  
27 CHRISTIAN SEDANO,  
aka "Bugsee,"

10 CR 2:25-CR-00434-JLS

11 I N D I C T M E N T

12 [18 U.S.C. § 1962(d): Racketeer  
Influenced and Corrupt  
Organizations Conspiracy; 18  
U.S.C. §§ 1959(a)(3), (a)(5):  
Violent Crimes in Aid of  
Racketeering Activity; 18 U.S.C.  
§ 1349: Conspiracy to Commit Wire  
Fraud and Bank Fraud; 18 U.S.C.  
§ 371: Conspiracy; 18 U.S.C.  
§ 922(g)(1), (g)(5)(A): Prohibited  
Person in Possession of Firearms  
and Ammunition; 18 U.S.C.  
§ 922(o)(1): Possession of  
Machineguns; 26 U.S.C. § 5861(d):  
Possession of Unregistered  
Firearms; 26 U.S.C. § 5861(i):  
Possession of Firearms Not  
Identified by a Serial Number;  
18 U.S.C. § 1963, 18 U.S.C.  
§ 981(a)(1)(C), 18 U.S.C. § 982,  
28 U.S.C. § 2461(c), 18 U.S.C.  
§ 924(d), 26 U.S.C. § 5872:  
Criminal Forfeiture]

1 Defendants. |  
2

3 The Grand Jury charges:

4 INTRODUCTORY ALLEGATIONS

5 At times relevant to this Indictment:

6 A. ARMENIAN ORGANIZED CRIME IN LOS ANGELES COUNTY

7 1. Armenian Organized Crime, also referred to as the Armenian  
8 Mafia, originated in the former Union of Soviet Socialist Republics  
9 (the "USSR") and following the Cold War, existed under the control of  
10 the Russian Mafia (Russian: русская мафия, Romanized: Russkaya  
11 Mafiya), also known as ("aka") Bratva (Russian: Братва, English:  
12 brotherhood or band of brothers).

13 2. Armenian Organized Crime comprised senior leaders, members,  
14 and associates who resided in modern-day Russia and Armenia, as well  
15 as other countries, including France, Spain, Iran, and the United  
16 States. In the United States, most Armenian Organized Crime leaders,  
17 members, and associates resided in Los Angeles County, which  
18 contained one of the largest Armenian populations outside of Russia  
19 and Armenia.

20 3. Armenian Organized Crime followed a "flat" or "flattened"  
21 organizational structure, in contrast to its traditional, strict,  
22 linear one where each member carried a specific title or rank and  
23 there was a clear, designated chain of command. In Los Angeles  
24 County, this organizational restructuring led to the creation of  
25 decentralized, hybrid crime crews that included Armenian Organized  
Crime members as well as non-member and/or non-Armenian criminals.

27 4. When residing outside of the former USSR and its  
28 surrounding territories, Armenian Organized Crime groups camouflaged

1 themselves amongst expatriate and immigrant Armenian communities and  
2 used these communities as bases to establish Armenian criminal  
3 organizations internationally. A hallmark of Armenian Organized  
4 Crime was the strategic use of violence to send a message, increase  
5 an individual's position within the Armenian criminal community,  
6 and/or leverage a business interest. To avoid law enforcement  
7 detection, Armenian Organized Crime often assigned these acts of  
8 violence to non-Armenian criminal associates, such as members of  
9 black and *Sureño* street gangs.

10 5. Power and leadership in Armenian Organized Crime was based,  
11 among other things, on a combination of respect, seniority, that is,  
12 physical age, authority within the Russian Mafia, and relatedly,  
13 authority and influence within the Armenian criminal community.  
14 Traditionally, Armenian Organized Crime members and associates  
15 reported to a specific, high-level male crime boss who was born  
16 either in Armenia or a country that was formerly part of the USSR.  
17 In Armenian Organized Crime, this crime boss was known as a "orenk'ov  
18 gogh" (Armenian: օրենքով զոհ, English: "thief in law") or "gogh" for  
19 short. Colloquially, *goghs* were also referred to as "kerop" (or  
20 "qerop"), which is Armenian slang for both "made man" and "wise guy."  
21 A *gogh* could not be crowned, that is, named or appointed, without the  
22 blessing and/or approval of the Russian Mafia.

23 6. Under each *gogh*, there were multiple elders who each  
24 controlled their own organized crime group. The elders were the  
25 direct connection to the *gogh*, and they were responsible for meting  
26 out tasks or giving orders to the members and associates of their  
27 respective group. In essence, the elders were responsible for  
28 controlling the day-to-day and street-level criminal activity in

1 their groups. Under each elder, there were assorted members and/or  
2 non-member associates with authority and influence within the  
3 Armenian criminal community.

4       7. Armenian Organized Crime also included individuals of  
5 influence called "avtoritet" (Russian: авторитет, English: person of  
6 significant authority) who commonly controlled their own crime  
7 groups. Though revered in the Armenian criminal community,  
8 *avtoritet*, unlike *goghs*, were not crowned by the Russian Mafia.  
9 Nevertheless, *avtoritet* had reputations and were notorious in, among  
10 other places, the Armenian criminal underworld. In Los Angeles  
11 County, *avtoritet* commonly operated independently and led their own  
12 organized crime groups, thereby wielding power over Armenian criminal  
13 organizations, including Armenian Organized Crime, the Armenian Power  
14 criminal street gang, and non-member Armenians who committed crimes.

15       B. THE ENTERPRISE

16       8. Defendants ARA ARTUNI, also known as ("aka") "Ara  
17 Harutyunyan," "Aro," "Araboyi," "Arabo," and "Santos," ALEX AGOPIAN,  
18 aka "Alik," DAVIT HAZRYAN, aka "Davo," "Dav," and "D," VAHAGN  
19 STEPANYAN, aka "Vee," "Vova Titov," "Juha Alver," "Vahan Stephanian,"  
20 and "Aso Balvanov," ARVIN ALBERT KAZARYAN, aka "Artur" and "Art,"  
21 AREG BEZIK, aka "Elvis Narek" and formerly known as "Narek Bezikian,"  
22 MANUK MANUKYAN, LEVON ARAKELYAN, and CHRISTIAN SEDANO, aka "Bugsee,"  
23 and others known and unknown to the Grand Jury, were members and  
24 associates of a criminal organization (the "Artuni Enterprise") that  
25 engaged in, among other things, acts involving murder, theft from  
26 interstate shipments, bank and wire fraud, and forgery and false use  
27 of a passport.

9. The Artuni Enterprise was an Armenian Organized Crime group that operated in Los Angeles County and elsewhere with defendant ARTUNI at the helm. As an *avtoritet*, defendant ARTUNI commanded respect and occupied a position of power within the Armenian criminal community in the greater Los Angeles area. Typical of the flat Armenian Organized Crime structure, defendant ARTUNI loosely commanded Armenian members of his organization, and he had non-Armenian criminal associates recruited for the purpose of committing crimes at his behest.

10. The Artuni Enterprise, including its leaders, members, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The Artuni Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

### C. PURPOSES OF THE ENTERPRISE

11. The purposes of the Artuni Enterprise included, but were not limited to, the following:

a. Enriching members and associates of the Artuni Enterprise through, among other things, the theft of interstate shipments and the commission of fraud in Los Angeles County and elsewhere:

b. Establishing control over Armenian communities within Los Angeles County;

c. Preserving, protecting, and expanding the power of the Artuni Enterprise using intimidation, violence, and threats of violence; and

d. Violently retaliating against rival Armenian Organized Crime groups or other members of the Armenian criminal community who challenged the Artuni Enterprise's authority or attempted to encroach upon the Artuni Enterprise's sphere of influence.

#### D. MEANS AND METHODS OF THE ENTERPRISE

12. The means and methods by which the members and associates of the Artuni Enterprise conducted and participated in the conduct of the affairs of the Artuni Enterprise included, but were not limited to, the following:

a. Members and associates of the Artuni Enterprise stole from interstate shipments and committed fraud to generate revenue for the enterprise.

b. Members and associates of the Artuni Enterprise promoted a climate of fear through acts of violence and threats to commit acts of violence.

c. Members and associates of the Artuni Enterprise committed, attempted to commit, conspired to commit, and threatened to commit acts of violence, including assault and murder, to preserve, protect, and expand the Artuni Enterprise's operations.

## E. THE DEFENDANTS

13. Defendant ARTUNI, a self-reported Iranian citizen, person of Armenian descent, and resident of the Central District of California, was an *avtoritet* within the Armenian organized crime community and led his own organized crime group (the Artuni Enterprise).

1       14. Defendant AGOPIAN, a self-reported Azerbaijani citizen  
2 and person of Armenian descent, was a member and associate of the  
3 Artuni Enterprise and a resident of the Central District of  
4 California.

5       15. Defendant HAZRYAN, a naturalized United States citizen who  
6 was born in Armenia, was a member and associate of the Artuni  
7 Enterprise and a resident of the Central District of California.

8       16. Defendant STEPANYAN, a derivative United States citizen who  
9 self-reported being born in the USSR and was a person of Armenian  
10 descent, was a member and associate of the Artuni Enterprise and a  
11 resident of the Central District of California.

12       17. Defendant KAZARYAN, a natural-born United States citizen  
13 and person of Armenian descent, was a member and associate of the  
14 Artuni Enterprise and a resident of the Central District of  
15 California.

16       18. Defendant BEZIK, a self-reported Iranian citizen and person  
17 of Armenian descent, was a member and associate of the Artuni  
18 Enterprise and a resident of the Central District of California.

19       19. Defendant MANUKYAN, a self-reported citizen of the former  
20 USSR and person of Armenian descent, was an associate of the Artuni  
21 Enterprise and a resident of the Central District of California.

22       20. Defendant ARAKELYAN, a self-reported citizen of the former  
23 USSR and person of Armenian descent, was an associate of the Artuni  
24 Enterprise and a resident of the Central District of California or  
25 imprisoned in the District of Nevada.

26       21. Defendant SEDANO, a natural-born United States citizen, was  
27 an associate of the Artuni Enterprise and a resident of the Central  
28 District of California.

1       22. The Grand Jury realleges these Introductory Allegations in  
2 each count of this Indictment.  
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1 COUNT ONE

2 [18 U.S.C. § 1962(d) ]

3 [DEFENDANTS ARTUNI, AGOPIAN, HAZRYAN, STEPANYAN, KAZARYAN, BEZIK,  
4 MANUKYAN, AND SEDANO]

5 A. THE RACKETEERING CONSPIRACY

6 23. Beginning no later than in or around 2015, and continuing  
7 to in or around May 2025, in Los Angeles County, within the Central  
8 District of California, and elsewhere, defendants ARTUNI, AGOPIAN,  
9 HAZRYAN, STEPANYAN, KAZARYAN, BEZIK, MANUKYAN, and SEDANO, and others  
10 known and unknown to the Grand Jury, each being a person employed by  
11 and associated with the Artuni Enterprise, an enterprise that engaged  
12 in, and the activities of which affected, interstate and foreign  
13 commerce, knowingly and intentionally conspired to violate Title 18,  
14 United States Code, Section 1962(c), that is, to conduct and  
15 participate, directly and indirectly, in the conduct of the affairs  
16 of the Artuni Enterprise through a pattern of racketeering activity,  
17 as that term is defined in Title 18, United States Code, Sections  
18 1961(1) and 1961(5), which pattern of racketing consisted of:

19 a. Multiple acts involving murder, chargeable under  
20 California Penal Code Sections 21a, 31, 182, 187, 188, 189, and 664;  
21 and

22 b. Multiple acts indictable under:

23 i. Title 18, United States Code, Section 659  
24 (relating to theft from interstate shipments where the act indictable  
25 under the section is felonious);

26 ii. Title 18, United States Code, Section 1343  
27 (relating to wire fraud);

iii. Title 18, United States Code, Section 1344 (relating to financial institution fraud); and

iv. Title 18, United States Code, Section 1543 (relating to forgery or false use of a passport).

24. It was part of the conspiracy that each defendant agreed that a co-conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Artuni Enterprise.

B. MANNER AND MEANS OF THE CONSPIRACY

25. The object of the conspiracy was to be accomplished, in substance, as follows:

a. Defendants ARTUNI, AGOPIAN, HAZRYAN, STEPANYAN, and SEDANO, and others known and unknown to the Grand Jury, would direct, coordinate, assist in, or otherwise contribute to, the commission of violent crimes, including murder, attempted murder, and assault with a deadly weapon, to preserve and expand the power of the Artuni Enterprise.

b. Defendants STEPANYAN and SEDANO, and others known and unknown to the Grand Jury, would store and possess firearms and ammunition for the purpose of committing violent crimes on the Artuni Enterprise's behalf.

c. Defendants HAZRYAN, STEPANYAN, KAZARYAN, BEZIK, and SEDANO, and others known and unknown to the Grand Jury, would execute and attempt to execute financial crimes, including fraud related to financial institutions and the wires, the proceeds of which would be paid to members and associates of the Artuni Enterprise.

Specifically:

i. Defendant HAZRYAN and others known and unknown to the Grand Jury would process credit card payments from willing

1 participants, including defendants STEPANYAN and SEDANO, and others  
2 known and unknown to the Grand Jury, to pay for purported moving  
3 services provided by a company controlled by defendant HAZRYAN. In  
4 reality, no moving services had been provided, and the credit cards  
5 were used to transfer funds from the credit card issuers -- whose  
6 accounts were insured by the Federal Deposit Insurance Corporation --  
7 into bank accounts controlled by members of the conspiracy, including  
8 an account at Chase Bank (the "Chase Bank Account").

20 d. Defendant BEZIK, and others known and unknown to the  
21 Grand Jury, would masquerade as a legitimate member of Amazon.com,  
22 Inc.'s freight network to effectuate the theft of Amazon shipments,  
23 store the stolen Amazon products in a warehouse accessed by  
24 defendants ARTUNI, HAZRYAN, KAZARYAN, himself, and others known and  
25 unknown to the Grand Jury, and distribute the proceeds to members and  
26 associates of the Artuni Enterprise.

1 vehicles to be used by members and associates of the Artuni  
2 Enterprise in furtherance of the enterprise's racketeering  
3 activities.

4 C. OVERT ACTS

5 26. In furtherance of the racketeering conspiracy, and to  
6 accomplish its objects, on or about the following dates, defendants  
7 ARTUNI, AGOPIAN, HAZRYAN, STEPANYAN, KAZARYAN, BEZIK, MANUKYAN, and  
8 SEDANO, together with others known and unknown to the Grand Jury,  
9 committed and willfully caused to be committed various overt acts  
10 within the Central District of California and elsewhere, including,  
11 but not limited to, the following:

12 **July 21, 2020: Shooting Targeting Victims 1 and 2 in Burbank,**

13 **California**

14 Overt Act No. 1: On or before June 30, 2020, defendant  
15 STEPANYAN purchased a prepaid cellular phone that he registered under  
16 the alias "Vova Titov" and used to communicate with a co-conspirator  
17 who was a documented member of Psycho Ass Life ("PAL"), a *Sureño*  
18 street gang ("CC-1").

19 Overt Act No. 2: On June 30, 2020, in a series of text  
20 messages using coded language, defendant STEPANYAN asked CC-1 to  
21 contact him and informed CC-1 that he would provide him with clothes.

22 Overt Act No. 3: On July 2, 2020, via text message, defendant  
23 STEPANYAN and CC-1 communicated regarding the latter's location.

24 Overt Act No. 4: On July 2, 2020, CC-1 photographed a picture  
25 depicting Victim 1.

26 Overt Act No. 5: On July 10, 2020, defendant STEPANYAN  
27 traveled to or near Victim 1 and 2's residence in Burbank,  
28 California.

1       Overt Act No. 6:    On July 13, 2020, defendant STEPANYAN  
2 traveled to or near Victim 1 and 2's residence.

3       Overt Act No. 7:    On July 16, 2020, defendant STEPANYAN and  
4 CC-1 met in person at Burger King in Glendale, California.

5       Overt Act No. 8:    On July 17, 2020, via text message and using  
6 coded language, CC-1 asked if defendant STEPANYAN could provide him  
7 with a vehicle.

8       Overt Act No. 9:    On July 17, 2020, via text message and using  
9 coded language, defendant STEPANYAN instructed CC-1 to take care of  
10 the vehicle defendant STEPANYAN provided him.

11       Overt Act No. 10:   On July 18, 2020, CC-1 traveled to or near  
12 Victim 1 and 2's residence.

13       Overt Act No. 11:   On July 18, 2020, via text message and using  
14 coded language, CC-1 informed defendant STEPANYAN that he decided not  
15 to attempt to murder Victim 1 that evening.

16       Overt Act No. 12:   Between July 20 and July 21, 2020, CC-1  
17 traveled to Victim 1 and 2's residence in a black Mercedes-Benz  
18 bearing two stolen license plates.

19       Overt Act No. 13:   On July 21, 2020, CC-1 broke into Victim 1  
20 and 2's residence.

21       Overt Act No. 14:   On July 21, 2020, CC-1, using a Polymer80  
22 PB94DC 9mm firearm bearing no serial number (commonly referred to as  
23 a "ghost gun") with a silencer attached (the "Polymer80"), shot and  
24 killed Victim 1 while he was in bed with his wife (Victim 2).

25       Overt Act No. 15:   On July 21, 2020, CC-1, using the Polymer80,  
26 shot Victim 2 multiple times while she was in bed with Victim 1,  
27 causing her serious bodily injury.

1       Overt Act No. 16: On July 21, 2020, via text message and using  
2 coded language, defendant STEPANYAN checked on CC-1's status.

3       Overt Act No. 17: Between July 20 and July 22, 2020, after the  
4 shooting that killed Victim 1 and seriously injured Victim 2,  
5 defendant AGOPIAN obtained a new cellphone number ending in -1313.

6       Overt Act No. 18: On July 22, 2020, via text message, in  
7 Armenian, and using coded language, defendant AGOPIAN, using his new  
8 number ending in -1313, told defendant ARTUNI to text like everything  
9 was normal, which defendant ARTUNI agreed to do.

10       Overt Act No. 19: On July 23, 2020, defendant STEPANYAN  
11 stopped using the prepaid cellular phone that he had registered under  
12 the alias "Vova Titov."

13       **June 12, 2023: Shooting Targeting Victim 3 in Los Angeles**

14       Overt Act No. 20: On a date before June 12, 2023, defendant  
15 KAZARYAN, and others known and unknown to the Grand Jury, leased a  
16 blue BMW X6 M50 (the "BMW X6") for defendant BEZIK and registered the  
17 vehicle in defendant KAZARYAN's father's name.

18       Overt Act No. 21: On June 12, 2023, defendant HAZRYAN traveled  
19 to or near a residence in Van Nuys, California where Victim 3 was  
20 located.

21       Overt Act No. 22: On June 12, 2023, defendant ARTUNI traveled  
22 to or near a residence in Van Nuys where Victim 3 was located.

23       Overt Act No. 23: On June 12, 2023, defendant HAZRYAN traveled  
24 to or near a Shell Gas Station in Reseda, California where Victim 3  
25 was parked.

26       Overt Act No. 24: On June 12, 2023, defendant STEPANYAN turned  
27 off or stopped using his cellular phone so that it would stop  
28 reporting Global Positioning System ("GPS") location data.

1       Overt Act No. 25: On June 12, 2023, a member of the conspiracy  
2 driving the BMW X6 and a member of the conspiracy driving a GMC  
3 Acadia SUV (the "GMC SUV") trailed and surveilled Victim 3 as Victim  
4 traveled in and around the greater Los Angeles area.

5       Overt Act No. 26: On June 12, 2023, a member of the conspiracy  
6 drove in front of Victim 3's vehicle in the BMW X6 and purposely  
7 caused Victim 3 to slow down at an intersection on Melvin Avenue and  
8 Devonshire Street in the San Fernando Valley.

9       Overt Act No. 27: On June 12, 2023, a member of the conspiracy  
10 drove alongside Victim 3's vehicle in the GMC SUV, as Victim 3 slowly  
11 turned on to Melvin Avenue.

12       Overt Act No. 28: On June 12, 2023, a member of the conspiracy  
13 in the GMC SUV, using a handgun, fired approximately eight rounds of  
14 Federal .45 caliber ammunition at Victim 3's vehicle from the GMC  
15 SUV, hitting the driver's side door approximately seven times.

16       Overt Act No. 29: On June 12, 2023, members of the conspiracy  
17 fled from the intersection in the BMW X6 and GMC SUV.

18       Overt Act No. 30: On June 12, 2023, following the shooting,  
19 defendant HAZRYAN fled to a location in Tujunga, California.

20       Overt Act No. 31: On June 12, 2023, following the shooting,  
21 defendant ARTUNI fled to a location in Tujunga.

22       Overt Act No. 32: Beginning on an unknown date and continuing  
23 to December 12, 2023, defendant HAZRYAN possessed aerial drone  
24 footage dated August 8, 2023, depicting Victim 3's residence on an  
25 iPhone 15 Pro ("iPhone 15 Pro").

26       **July 7, 2023: Shooting Targeting Victims 4 and 5 in Burbank**

27       Overt Act No. 33: On July 2, 2023, defendant HAZRYAN traveled  
28 to or near Victim 4 and 5's residence.

1       Overt Act No. 34:    Between July 4 and July 9, 2023, defendant  
2 HAZRYAN met with defendant ARTUNI at the latter's residence in  
3 Tujunga multiple times.

4       Overt Act No. 35:    Beginning on an unknown date and continuing  
5 to December 12, 2023, defendant ARTUNI possessed screenshots of a  
6 background check for Victim 4, which included a map depicting Victim  
7 4 and 5's home address in Burbank, on an iPhone 14 Pro ("iPhone 14  
8 Pro").

9       Overt Act No. 36:    On July 7, 2023, defendant SEDANO obtained a  
10 Google Street View image of the alleyway behind Victim 4 and 5's  
11 residence, which depicted Victim 4 and 5's balcony.

12       Overt Act No. 37:    On July 7, 2023, defendants ARTUNI and  
13 HAZRYAN traveled together in and around the greater Los Angeles area,  
14 including to a tire shop in Vernon, California (the "Tire Shop").

15       Overt Act No. 38:    On or before July 7, 2023, defendant  
16 MANUKYAN obtained a fraudulent United States Passport Card depicting  
17 his likeness and bearing the alias "Briedis Malone."

18       Overt Act No. 39:    On July 7, 2023, using the fraudulent  
19 passport card, defendant MANUKYAN purchased a red lifted Ford F-150  
20 (the "F-150") for approximately \$7,000 in cash at the Tire Shop.

21       Overt Act No. 40:    On July 7, 2023, defendant STEPANYAN  
22 traveled to a storage facility in Sun Valley, California (the  
23 "Storage Facility").

24       Overt Act No. 41:    On July 7, 2023, defendant STEPANYAN  
25 traveled on the 5 freeway towards Burbank, California.

26       Overt Act No. 42:    On July 7, 2023, defendants ARTUNI,  
27 STEPANYAN, and SEDANO either turned off or stopped using their  
28 cellular phones so that they would stop reporting GPS location data.

1       Overt Act No. 43: On July 7, 2023, between approximately 10:14  
2 p.m. and 10:31 p.m., defendants HAZRYAN and BEZIK called each other  
3 multiple times.

4       Overt Act No. 44: On July 7, 2023, defendant HAZRYAN engaged  
5 Victim 4 on a Facetime call.

6       Overt Act No. 45: On July 7, 2023, defendant HAZRYAN traveled  
7 to or near Victim 4 and 5's residence.

8       Overt Act No. 46: On July 7, 2023, a member of the conspiracy  
9 drove the F-150 defendant MANUKYAN had purchased that same day down  
10 an alleyway and stopped the F-150 right in front of Victim 4 and 5's  
11 balcony.

12       Overt Act No. 47: On July 7, 2023, a member of the conspiracy,  
13 using a Glock, model 21, .45 Auto caliber semi-automatic pistol  
14 bearing serial number KDK598 with an attached auto sear (the  
15 "Glock"), and a 10mm pistol-type gun with an attached auto sear,  
16 stood up in the bed of the F-150 and fired at least 18 rounds of  
17 Hornady 45 Auto and CCI NR 10mm Auto ammunition at the balcony where  
18 Victim 4 and his wife (Victim 5) were seated, striking Victim 4  
19 multiple times and causing him serious bodily injury.

20       Overt Act No. 48: On July 7, 2023, after the shooting, members  
21 of the conspiracy fled from Victim 4 and 5's residence.

22       Overt Act No. 49: On July 7, 2023, at an intersection in  
23 Burbank, a member of the conspiracy exited the bed of the F-150 and  
24 entered defendant SEDANO's Toyota Camry.

25       Overt Act No. 50: On July 7, 2023, after the shooting,  
26 defendant STEPANYAN returned to the Storage Facility.

27       Overt Act No. 51: On July 7, 2023, after the shooting,  
28 defendants ARTUNI and HAZRYAN traveled to Porter Ranch, California.

Overt Act No. 52: On or after July 7, 2023, defendant HAZRYAN conducted an Internet search for "shooting in north Hollywood" on his iPhone 15 Pro.

Overt Act No. 53: On December 12, 2023, defendants STEPANYAN and SEDANO, and others known and unknown to the Grand Jury, possessed the Glock used in the shooting at Victim 4 and 5's residence, among other items, in Unit B16 at the Storage Facility.

**August 18, 2023: Shooting Targeting Victim 6 in North Hills, California**

Overt Act No. 54: On or before August 18, 2023, defendant ARTUNI obtained aerial drone footage dated July 30, 2023, depicting Victim 6's residence and saved it on his iPhone 14 Pro.

Overt Act No. 55: On August 18, 2023, defendant STEPANYAN traveled to or near Victim 6's residence in North Hills.

Overt Act No. 56: On August 18, 2023, defendants ARTUNI, STEPANYAN, KAZARYAN, and SEDANO either turned off or stopped using their cellular phones so that they would stop reporting GPS location data.

Overt Act No. 57: On August 18, 2023, defendant HAZRYAN traveled to or near Victim 6's residence in North Hills.

Overt Act No. 58: On August 18, 2023, a member of the conspiracy drove to Victim 6's residence on a motorcycle.

Overt Act No. 59: On August 18, 2023, a member of the conspiracy drove a pickup truck to Victim 6's residence.

Overt Act No. 60: On August 18, 2023, the member of the conspiracy who arrived on the motorcycle retrieved, among other items, a step ladder from the pickup truck, used the ladder to climb

1 up a wall surrounding Victim 6's residence, and fired approximately  
2 nine rounds of 7.62x39mm caliber ammunition at Victim 6's residence.

3 Overt Act No. 61: On August 18, 2023, members of the  
4 conspiracy fled from Victim 6's residence.

5 Overt Act No. 62: On August 18, 2023, defendant HAZRYAN  
6 remained near Victim 6's residence in North Hills, later leaving  
7 North Hills and arriving in Van Nuys over an hour later.

8 **August 25, 2023: Shooting Targeting Victims 4, 6, 7, and Others in**  
9 **North Hills**

10 Overt Act No. 63: On August 25, 2023, defendant HAZRYAN drove  
11 defendants ARTUNI and AGOPIAN to the Storage Facility in a dark  
12 Nissan Infiniti QX80 SUV (the "Infiniti SUV") registered in defendant  
13 KAZARYAN's father's name.

14 Overt Act No. 64: On August 25, 2023, defendant STEPANYAN  
15 drove a white Mercedes-Benz S-Class (the "Mercedes-Benz") to the  
16 Storage Facility.

17 Overt Act No. 65: On August 25, 2023, defendant STEPANYAN  
18 exited the Mercedes-Benz and entered the Infiniti SUV, which was  
19 occupied by defendants ARTUNI, AGOPIAN, and HAZRYAN.

20 Overt Act No. 66: On August 25, 2023, defendants STEPANYAN and  
21 AGOPIAN exited the Infiniti SUV and entered the Mercedes-Benz, with  
22 defendant STEPANYAN in the driver's seat, and left the Storage  
23 Facility.

24 Overt Act No. 67: On August 25, 2023, defendants STEPANYAN and  
25 AGOPIAN returned to the Storage Facility in the Mercedes-Benz.

26 Overt Act No. 68: On August 25, 2023, defendants ARTUNI,  
27 AGOPIAN, HAZRYAN, and STEPANYAN entered the Storage Facility, with

1 defendant STEPANYAN carrying a guitar case retrieved from the  
2 Mercedes-Benz and headed to Unit B16.

3 Overt Act No. 69: On August 25, 2023, defendants ARTUNI,  
4 AGOPIAN, HAZRYAN, and STEPANYAN exited the Storage Facility, with  
5 defendant AGOPIAN carrying the guitar case, now containing firearms,  
6 which he then placed into the Mercedes-Benz.

7 Overt Act No. 70: On August 25, 2023, defendant STEPANYAN left  
8 the Storage Facility in the Mercedes-Benz.

9 Overt Act No. 71: On August 25, 2023, defendants ARTUNI,  
10 AGOPIAN, and HAZRYAN left the Storage Facility in the Infiniti SUV,  
11 with defendant HAZRYAN in the driver's seat and defendants ARTUNI and  
12 AGOPIAN seated as passengers.

13 Overt Act No. 72: From August 25 to August 26, 2023, defendant  
14 SEDANO either turned off or stopped using his cellular phone so that  
15 it would stop reporting GPS location data.

16 Overt Act No. 73: On August 25, 2023, defendant ARTUNI  
17 traveled to or near Victim 6's residence.

18 Overt Act No. 74: On August 25, 2023, defendant HAZRYAN  
19 traveled to or near Victim 6's residence.

20 Overt Act No. 75: On August 25, 2023, defendant STEPANYAN  
21 traveled to or near Victim 6's residence.

22 Overt Act No. 76: On August 25, 2023, defendant ARTUNI either  
23 turned off or stopped using his cellular phone so that it would stop  
24 reporting GPS location data.

25 Overt Act No. 77: On August 25, 2023, a member of the  
26 conspiracy drove a gray pickup truck to a location facing the  
27 backyard of Victim 6's residence with two other members of the  
28 conspiracy in the bed of the truck along with a guitar case.

1       Overt Act No. 78: On August 25, 2023, a member of the  
2 conspiracy stood up in the bed of the pickup truck and, using a  
3 5.56mm caliber rifle, fired at least 34 rounds of 5.56mm caliber  
4 ammunition into the backyard of Victim 6's residence where Victims 4,  
5 6, 7, and others were congregated.

6       Overt Act No. 79: On August 25, 2023, another member of the  
7 conspiracy, who was also in the bed of the pickup truck with a  
8 firearm, attempted to fire into the backyard of Victim 6's residence  
9 where Victims 4, 6, 7, and others were congregated.

10      Overt Act No. 80: On August 25, 2023, after the shooting, the  
11 members of the conspiracy in the pickup truck fled from Victim 6's  
12 residence.

13      Overt Act No. 81: On August 25, 2023, following the shooting,  
14 defendant HAZRYAN fled from the vicinity of Victim 6's residence,  
15 first to Granada Hills, California, and later to Porter Ranch.

16      Overt Act No. 82: On August 25, 2023, after the shooting,  
17 defendant ARTUNI traveled to Northridge.

18      **November 9, 2023: Shooting Targeting Victim 8 in Los Angeles**

19      Overt Act No. 83: On or before November 9, 2023, defendant  
20 ARTUNI advised Victim 8 that his associate would not be paying Victim  
21 8 the money that Victim 8 believed he was owed.

22      Overt Act No. 84: On March 3, 2023, a white Toyota Camry (the  
23 "white Camry") was purchased using the personal identifying  
24 information of a third party and registered to an address associated  
25 with defendant HAZRYAN in Glendale.

26      Overt Act No. 85: On August 10, 2023, defendant HAZRYAN  
27 attempted to make a one-time payment of \$1,230.30 from a Bank of  
28 America account in the name of a sham canine business controlled by

1 defendant HAZRYAN (DK9, Inc.) to Toyota Financial for the white  
2 Camry's lease.

3 Overt Act No. 86: On November 9, 2023, defendant STEPANYAN  
4 arrived at the Storage Facility in the white Camry, carried a  
5 cardboard box inside, and headed toward Unit B16.

6 Overt Act No. 87: On November 9, 2023, defendant STEPANYAN  
7 exited the Storage Facility carrying a black case, which he placed  
8 into the white Camry before departing the Storage Facility.

9 Overt Act No. 88: On November 9, 2023, defendants ARTUNI and  
10 SEDANO either turned off or stopped using their cellular phones so  
11 that they would stop reporting GPS location data.

12 Overt Act No. 89: On November 9, 2023, defendant HAZRYAN  
13 travelled to or near a Starbucks in Los Angeles.

14 Overt Act No. 90: On November 9, 2023, defendant STEPANYAN,  
15 driving the white Camry, arrived at the Starbucks, pulled into the  
16 parking lot, and parked across from the vehicle in which Victim 8 was  
17 sitting.

18 Overt Act No. 91: On November 9, 2023, a member of the  
19 conspiracy driving a tan-colored Nissan Armada entered the Starbucks  
20 parking lot and backed into an empty parking space in the parking  
21 lot.

22 Overt Act No. 92: On November 9, 2023, defendant STEPANYAN  
23 accelerated through the Starbucks parking lot in the white Camry and  
24 departed.

25 Overt Act No. 93: On November 9, 2023, a member of the  
26 conspiracy driving the Nissan Armada pulled out of the parking space  
27 and stopped, facing Victim 8's vehicle.

28

1       Overt Act No. 94: On November 9, 2023, a member of the  
2 conspiracy, using a Century Arms, model C39v2, 7.62x39mm caliber  
3 rifle bearing serial number C39P2A01084 (the "Century Arms Rifle"),  
4 fired approximately six rounds of 7.62mm ammunition at Victim 8's  
5 vehicle, striking Victim 8 multiple times and causing him serious  
6 bodily injury.

7       Overt Act No. 95: On November 9, 2023, after the shooting, a  
8 member of the conspiracy and defendant STEPANYAN drove in tandem  
9 while fleeing from the Starbucks.

10       Overt Act No. 96: On November 9, 2023, defendant HAZRYAN fled  
11 to Tujunga.

12       Overt Act No. 97: On November 10 and November 11, 2023,  
13 defendant HAZRYAN conducted the following Internet searches:  
14 "shooting in tujunga today," "Man shot in Tujunga," "shooting in  
15 tujunga star bucks," "SUNLAND-TUJUNGA AREA EMERGENCY POLICE-FIRE  
16 SCANNER NEWS," "Tujunga police activity today," and "Sunland tujunga  
17 police activity today."

18       Overt Act No. 98: On December 12, 2023, defendants STEPANYAN  
19 and SEDANO, and others known and unknown to the Grand Jury, possessed  
20 the Century Arms Rifle in Unit B16 at the Storage Facility.

21                   **Freedom At Enterprise, Inc. Credit Card Fraud Scheme**

22       Overt Act No. 99: On July 8, 2015, a co-conspirator ("CC-2")  
23 incorporated Freedom At Enterprise, Inc., a purported moving company,  
24 in Delaware County, within the Eastern District of Pennsylvania,  
25 designating CC-2 as the agent in the State of Pennsylvania.

26       Overt Act No. 100: On August 26, 2020, CC-2 incorporated  
27 Freedom At Enterprise, Inc. in Los Angeles County, within the Central  
28

1 District of California, designating CC-2 as the agent in the State of  
2 California.

3 Overt Act No. 101: On January 13, 2021, CC-2 opened a JPMorgan  
4 Chase Bank ("Chase Bank") business checking account ending in -6361,  
5 designating CC-2 as the account owner.

6 Overt Act No. 102: On October 10, 2023, a photograph of a Chase  
7 Bank business debit card bearing CC-2's name was saved onto defendant  
8 HAZRYAN's iPhone 15 Pro.

9 Overt Act No. 103: On October 10, 2023, photographs depicting a  
10 printout listing first and last initials, phone numbers, email  
11 addresses, credit card limits, and addresses for individuals,  
12 including, but not limited to, defendants STEPANYAN and SEDANO, and  
13 others known and unknown to the Grand Jury, were saved onto defendant  
14 HAZRYAN's iPhone 15 Pro.

15 Overt Act No. 104: On an unknown date, a Google email address  
16 was created for Freedom At Enterprise, Inc., which was managed and  
17 controlled by defendant HAZRYAN.

18 Overt Act No. 105: On October 2, 2023, defendant HAZRYAN caused  
19 a transfer of \$5,000 from the Chase Bank Account into a Zelle account  
20 he controlled.

21 Overt Act No. 106: On October 6, 2023, defendant HAZRYAN caused  
22 a transfer of \$600 from the Chase Bank Account into a Zelle account  
23 he controlled.

24 Overt Act No. 107: On October 6, 2023, defendant AGOPIAN caused  
25 a check for \$8,000 from Freedom At Enterprise, Inc. to be deposited  
26 into his Citibank, N.A. ("Citibank") account.

27  
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1       Overt Act No. 108: On October 10, 2023, defendant HAZRYAN  
2 caused a transfer of \$200 from the Chase Bank Account into a Zelle  
3 account he controlled.

4       Overt Act No. 109: On October 10, 2023, defendant HAZRYAN  
5 caused a transfer of \$700 from the Chase Bank Account into a Zelle  
6 account he controlled.

7       Overt Act No. 110: On October 13, 2023, defendant HAZRYAN  
8 caused a transfer of \$1,500 from the Chase Bank Account into a Zelle  
9 account he controlled.

10       Overt Act No. 111: On October 16, 2023, defendant HAZRYAN  
11 caused a transfer of \$900 from the Chase Bank Account into a Zelle  
12 account he controlled.

13       Overt Act No. 112: On October 19, 2023, defendant HAZRYAN  
14 caused a transfer of \$1,500 from the Chase Bank Account into a Zelle  
15 account he controlled.

16       Overt Act No. 113: On October 19, 2023, defendant BEZIK caused  
17 a check for \$20,860 from Freedom At Enterprise, Inc. to be cashed at  
18 A to Z Check Cashing in Glendale ("A to Z").

19       Overt Act No. 114: On October 20, 2023, defendant BEZIK caused  
20 a check for \$5,880 from Freedom At Enterprise, Inc. to be cashed at A  
21 to Z.

22       Overt Act No. 115: On October 23, 2023, defendant HAZRYAN  
23 caused a transfer of \$1,500 from the Chase Bank Account into a Zelle  
24 account he controlled.

25       Overt Act No. 116: On October 24, 2023, defendant BEZIK caused  
26 a check for \$37,635 from Freedom At Enterprise, Inc. to be cashed at  
27 A to Z.

1       Overt Act No. 117: On October 26, 2023, defendant HAZRYAN  
2 caused a transfer of \$1,500 from the Chase Bank Account into a Zelle  
3 account he controlled.

4       Overt Act No. 118: On October 28, 2023, defendant BEZIK caused  
5 a check for \$8,100 from Freedom At Enterprise, Inc. to be cashed at A  
6 to Z.

7       Overt Act No. 119: On October 28, 2023, via text message using  
8 coded language, defendant HAZRYAN sent a co-conspirator ("CC-3")  
9 "Freedom at enterprise inc, \$28150" and included the address for a  
10 commercial mail receiving center in Burbank.

11       Overt Act No. 120: On October 30, 2023, defendant HAZRYAN  
12 caused a transfer of \$1,000 from the Chase Bank Account into a Zelle  
13 account he controlled.

14       Overt Act No. 121: On November 1, 2023, defendant HAZRYAN  
15 caused a transfer of \$2,000 from the Chase Bank Account into a Zelle  
16 account he controlled.

17       Overt Act No. 122: On November 2, 2023, defendant BEZIK caused  
18 a check for \$51,783 from Freedom At Enterprise, Inc. to be cashed at  
19 A to Z.

20       Overt Act No. 123: On November 3, 2023, defendant HAZRYAN  
21 caused a transfer of \$2,000 from the Chase Bank Account into a Zelle  
22 account he controlled.

23       Overt Act No. 124: On November 3, 2023, defendant HAZRYAN  
24 caused a transfer of \$500 from the Chase Bank Account into a Zelle  
25 account he controlled.

26       Overt Act No. 125: On November 5, 2023, via text message,  
27 defendant HAZRYAN sent himself a screenshot of a Quickbooks statement

1 for Freedom At Enterprise, Inc. from August 1 to August 31, 2023,  
2 indicating a total gross transaction amount of \$312,636.

3 Overt Act No. 126: On November 5, 2023, via text message,  
4 defendant HAZRYAN sent himself a screenshot of a Quickbooks statement  
5 for Freedom At Enterprise, Inc. from September 1 to September 30,  
6 2023, indicating a total gross transaction amount of \$213,951.30.

7 Overt Act No. 127: On November 5, 2023, via text message,  
8 defendant HAZRYAN sent himself a screenshot of a Quickbooks statement  
9 for Freedom At Enterprise, Inc. from October 1 to October 31, 2023,  
10 indicating a total gross transaction amount of \$97,951.30.

11 Overt Act No. 128: On November 6, 2023, defendant AGOPIAN  
12 received an \$8,000 wire from the Chase Bank Account into his Citibank  
13 account.

14 Overt Act No. 129: On November 7, 2023, defendant AGOPIAN  
15 received a \$20,000 wire from the Chase Bank Account into his Citibank  
16 account.

17 Overt Act No. 130: On November 7, 2023, defendant HAZRYAN  
18 caused a transfer of \$1,200 from the Chase Bank Account into a Zelle  
19 account he controlled.

20 Overt Act No. 131: On November 8, 2023, defendant BEZIK caused  
21 a check for \$21,975 from Freedom At Enterprise, Inc. to be cashed at  
22 Tres Hermanos Market in Panorama City, California.

23 Overt Act No. 132: On November 8, 2023, defendant HAZRYAN  
24 caused a transfer of \$700 from the Chase Bank Account into a Zelle  
25 account he controlled.

26 Overt Act No. 133: On November 9, 2023, defendant HAZRYAN  
27 caused a transfer of \$1,000 from the Chase Bank Account into a Zelle  
28 account he controlled.

1       Overt Act No. 134: On November 10, 2023, defendant HAZRYAN  
2 caused a transfer of \$860 from the Chase Bank Account into a Zelle  
3 account he controlled.

4       Overt Act No. 135: On November 11, 2023, via text messages and  
5 using coded language, a co-conspirator ("CC-4") asked defendant  
6 HAZRYAN for documentation CC-4 could provide the bank relating to  
7 Freedom At Enterprise, Inc. to support a dispute claim.

8       Overt Act No. 136: On November 14, 2023, defendant AGOPIAN  
9 caused a \$20,000 wire from the Chase Bank Account to be sent to his  
10 Citibank account.

11       Overt Act No. 137: On November 16, 2023, defendant BEZIK caused  
12 a check for \$8,595 from Freedom At Enterprise, Inc. to be cashed at A  
13 to Z.

14       Overt Act No. 138: On November 16, 2023, defendant HAZRYAN  
15 caused a transfer of \$1,000 from the Chase Bank Account into a Zelle  
16 account he controlled.

17       Overt Act No. 139: On November 17, 2023, defendant HAZRYAN  
18 caused a transfer of \$2,000 from the Chase Bank Account into a Zelle  
19 account he controlled.

20       Overt Act No. 140: On November 19, 2023, defendant HAZRYAN  
21 saved a photograph of an email from Wells Fargo Bank regarding a  
22 dispute to a charge to Freedom At Enterprise, Inc. for \$10,400 onto  
23 his iPhone 8.

24       Overt Act No. 141: On November 20, 2023, defendant HAZRYAN  
25 caused a transfer of \$380 from the Chase Bank Account into a Zelle  
26 account he controlled.

1       Overt Act No. 142: On November 20, 2023, defendant HAZRYAN  
2 caused a transfer of \$760 from the Chase Bank Account into a Zelle  
3 account he controlled

4       Overt Act No. 143: On November 22, 2023, defendant HAZRYAN  
5 saved a photograph of a check payable to defendant SEDANO dated  
6 November 20, 2023, for \$6,050, onto his iPhone 8.

7       Overt Act No. 144: On November 22, 2023, defendant HAZRYAN  
8 saved a photograph of a check payable to defendant SEDANO dated  
9 November 21, 2023, for \$5,150 onto his iPhone 8.

10       Overt Act No. 145: On November 20, 2023, via text message using  
11 coded language, defendant HAZRYAN sent CC-3 a \$28,150 invoice from  
12 Freedom At Enterprise Inc. for an individual bearing the initials  
13 Y.H. at Johnny and Son Trucking Inc with an email address of  
14 "Abodispatch@gmail.com."

15       Overt Act No. 146: On November 21, 2023, via text message using  
16 coded language in Armenian, defendant HAZRYAN asked CC-3 for his  
17 email, to which CC-3 replied "abodispatch@gmail.com."

18       Overt Act No. 147: On November 21 and November 22, 2023,  
19 defendants HAZRYAN and STEPANYAN exchanged email messages to make it  
20 falsely appear that Freedom At Enterprise, Inc. had canceled moving  
21 services that defendant STEPANYAN had booked in connection with a  
22 \$29,450 invoice.

23       Overt Act No. 148: On November 22, 2023, defendants HAZRYAN and  
24 SEDANO exchanged email messages to make it falsely appear that  
25 Freedom At Enterprise, Inc. had canceled moving services that  
26 defendant SEDANO had booked in connection with a \$14,185 invoice.

27       Overt Act No. 149: On November 22, 2023, defendant HAZRYAN and  
28 CC-3 exchanged email messages to make it falsely appear that Freedom

1 At Enterprise, Inc. had canceled moving services that CC-3 had booked  
2 in connection with a \$28,150 invoice.

3 Overt Act No. 150: On November 22, 2023, defendant SEDANO  
4 caused a check for \$5,150 from Freedom At Enterprise, Inc. to be  
5 deposited into a Chase Bank account.

6 Overt Act No. 151: On November 22, 2023, defendant SEDANO  
7 caused a check for \$6,050 from Freedom At Enterprise, Inc. to be  
8 deposited into a Bank of Montreal bank account.

9 Overt Act No. 152: On November 22, 2023, defendant HAZRYAN  
10 caused a transfer of \$570 from the Chase Bank Account into a Zelle  
11 account he controlled.

12 Overt Act No. 153: On November 22, 2023, defendant AGOPIAN  
13 caused a \$10,000 wire to be sent from the Chase Bank Account to his  
14 Citibank account.

15 Overt Act No. 154: On November 23 and November 24, 2023,  
16 defendants HAZRYAN and SEDANO exchanged email messages to make it  
17 falsely appear that Freedom At Enterprise, Inc. had canceled moving  
18 services that defendant SEDANO had booked in connection with a  
19 \$12,100 invoice.

20 Overt Act No. 155: On November 24, 2023, defendant HAZRYAN  
21 caused a transfer of \$2,400 from the Chase Bank Account into a Zelle  
22 account he controlled.

23 Overt Act No. 156: On November 24, 2023, defendant HAZRYAN  
24 saved a photograph of an invoice for \$5,463 dated November 13, 2023,  
25 from Freedom At Enterprise, Inc. onto his iPhone 8.

26 Overt Act No. 157: On November 25, 2023, defendant HAZRYAN  
27 saved a photograph of an invoice for \$5,463 from Freedom At  
28 Enterprise, Inc. onto his iPhone 8.

Overt Act No. 158: On November 25, 2023, defendant HAZRYAN saved a photograph of an invoice for \$7,956 dated November 11, 2023, from Freedom At Enterprise, Inc. onto his iPhone 8.

Overt Act No. 159: Between November 25, 2023, and November 27, 2023, defendant HAZRYAN caused \$1,300 to be transferred from the Chase Bank Account into a Zelle account he controlled.

Overt Act No. 160: On November 30, 2023, defendant HAZRYAN saved a photograph of an invoice for \$14,250 dated November 16, 2023, from Freedom At Enterprise, Inc. onto his iPhone 8.

Overt Act No. 161: On December 7, 2023, via text message using coded language, defendant HAZRYAN requested that CC-4 relay to the owner of the credit card that she should permit a transaction charged by him to go through.

## NBA Holdings, LLC Amazon Cargo Theft Scheme

Overt Act No. 162: On November 17, 2015, defendant BEZIK filed Articles of Organization for Sierra Transportation Services, LLC, registering it as a limited liability company with the California Secretary of State.

Overt Act No. 163: On December 4, 2018, a co-conspirator ("CC-5") filed an amendment to the Articles of Organization for Sierra Transportation Services, LLC, changing its name to NBA Holdings, LLC and claiming that it was an interior and exterior design business.

Overt Act No. 164: On July 15, 2021, CC-5 opened a business checking account at Bank of America (ending in -1669), listing CC-5 as the accountholder.

1       Overt Act No. 165: On July 20, 2021, CC-5 opened a business  
2 checking account at Bank of America (ending in -0244), listing CC-5  
3 as the accountholder.

4       Overt Act No. 166: On July 15, 2021, defendant BEZIK registered  
5 NBA Holdings, LLC with Amazon as a cargo relay carrier.

6       Overt Act No. 167: On October 3, 2021, NBA Holdings, LLC booked  
7 a contracted route to transport goods from a distribution center  
8 located in City of Industry, California to the Amazon fulfillment  
9 warehouse located in Lacey, Washington.

10       Overt Act No. 168: On October 5, 2021, a driver associated with  
11 NBA Holdings, LLC ("CC-6") arrived at the City of Industry  
12 distribution center.

13       Overt Act No. 169: On October 5, 2021, CC-6 departed from the  
14 City of Industry distribution center with an Amazon trailer,  
15 including approximately 980 Elite Gourmet Toasters collectively  
16 valued at approximately \$28,096.60.

17       Overt Act No. 170: On October 8, 2021, CC-6 arrived at the  
18 Lacey warehouse approximately three days after the scheduled arrival  
19 date with the 980 toasters missing.

20       Overt Act No. 171: On November 5, 2021, NBA Holdings, LLC  
21 booked a contracted route to transport goods from a distribution  
22 center located in Lynwood, California to an Amazon fulfillment  
23 warehouse located in Aurora, Colorado.

24       Overt Act No. 172: On November 8, 2021, a driver associated  
25 with NBA Holdings, LLC ("CC-7") arrived at the Lynwood distribution  
26 center.

27       Overt Act No. 173: On November 9, 2021, CC-7 departed from the  
28 Lynwood distribution center with an Amazon trailer, including, among

1 other items, approximately 534 Android Smart TVs collectively valued  
2 at approximately \$104,845.56.

3 Overt Act No. 174: On November 15, 2021, CC-7 arrived at the  
4 Aurora warehouse approximately four days after the scheduled arrival  
5 date with the 534 Android Smart TVs missing.

6 Overt Act No. 175: On February 6, 2022, defendant ARTUNI caused  
7 a \$5,000 transfer from NBA Holdings, LLC to be sent to a Zelle  
8 account in the name of his significant other and controlled by him.

9 Overt Act No. 176: On March 24, 2022, defendant ARTUNI caused a  
10 \$2,500 transfer from NBA Holdings, LLC to be sent to a Zelle account  
11 in the name of his significant other and controlled by him.

12 Overt Act No. 177: On April 27, 2022, defendant KAZARYAN caused  
13 a \$20,000 wire from NBA Holdings, LLC to be sent to a U.S. Bancorp  
14 ("U.S. Bank") account he controlled.

15 Overt Act No. 178: On September 9, 2022, defendant KAZARYAN  
16 caused a check for \$5,000 from NBA Holdings, LLC to be deposited into  
17 a U.S. Bank account in his father's name.

18 Overt Act No. 179: On September 13, 2022, defendant KAZARYAN  
19 caused a transfer of \$1,000 from NBA Holdings, LLC to a Zelle account  
20 he controlled.

21 Overt Act No. 180: On September 13, 2022, defendant KAZARYAN  
22 caused a transfer of \$5,000 from NBA Holdings, LLC to a Zelle account  
23 he controlled.

24 Overt Act No. 181: On September 20, 2022, defendant KAZARYAN  
25 caused a check for \$3,500 from NBA Holdings, LLC to be deposited into  
26 a U.S. Bank account in his father's name.

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1       Overt Act No. 182: On September 21, 2022, defendant KAZARYAN  
2 caused a check for \$6,362 from NBA Holdings, LLC to be deposited into  
3 a U.S. Bank account in his father's name.

4       Overt Act No. 183: On September 27, 2022, defendant BEZIK  
5 caused a check for \$10,000 from NBA Holdings, LLC to be deposited.

6       Overt Act No. 184: On October 21, 2022, defendant KAZARYAN  
7 caused a check for \$3,500 from NBA Holdings, LLC to be deposited into  
8 a U.S. Bank account in his father's name.

9       Overt Act No. 185: On October 25, 2022, defendant ARTUNI caused  
10 a \$5,000 transfer from NBA Holdings, LLC to be sent to a Zelle  
11 account in the name of his significant other and controlled by him.

12       Overt Act No. 186: On October 27, 2022, defendant BEZIK  
13 received a \$54,000 wire from NBA Holdings, LLC into a Comerica Bank  
14 account he controlled.

15       Overt Act No. 187: On November 2, 2022, defendant BEZIK  
16 received a \$86,000 wire from NBA Holdings, LLC into a Comerica Bank  
17 account he controlled.

18       Overt Act No. 188: On November 7, 2022, defendant KAZARYAN  
19 caused a check for \$8,000 from NBA Holdings, LLC to be deposited into  
20 a U.S. Bank account in his father's name.

21       Overt Act No. 189: On November 30, 2022, defendant BEZIK  
22 received a \$46,000 wire from NBA Holdings, LLC into a Comerica Bank  
23 account he controlled.

24       Overt Act No. 190: On December 1, 2022, defendant KAZARYAN  
25 caused a check for \$4,000 from NBA Holdings, LLC to be deposited into  
26 a U.S. Bank account in his father's name.

1       Overt Act No. 191: On January 10, 2023, defendant KAZARYAN  
2 caused a check for \$3,500 from NBA Holdings, LLC to be deposited into  
3 a U.S. Bank account in his father's name.

4       Overt Act No. 192: On January 31, 2023, defendant BEZIK  
5 received a \$30,000 wire from NBA Holdings, LLC into a Comerica Bank  
6 account he controlled.

7       Overt Act No. 193: On February 1, 2023, defendant KAZARYAN  
8 caused a transfer of \$2,800 from NBA Holdings, LLC to a Zelle account  
9 he controlled.

10       Overt Act No. 194: On February 1, 2023, defendant AGOPIAN  
11 received \$40,000 wire from NBA Holdings, LLC into his Citibank  
12 account.

13       Overt Act No. 195: On February 6, 2023, defendant ARTUNI caused  
14 a \$5,000 transfer from NBA Holdings, LLC to be sent to a Zelle  
15 account in the name of his significant other and controlled by him.

16       Overt Act No. 196: On February 13, 2023, defendant BEZIK  
17 received a \$53,000 wire from NBA Holdings, LLC into a Comerica Bank  
18 account he controlled.

19       Overt Act No. 197: On February 21, 2023, defendant AGOPIAN  
20 received an \$80,000 wire from NBA Holdings, LLC into his Citibank  
21 account.

22       Overt Act No. 198: On or about February 23, 2023, defendant  
23 ARTUNI caused a \$5,000 transfer from NBA Holdings, LLC to be sent to  
24 a Zelle account in the name of his significant other and controlled  
25 by him.

26       Overt Act No. 199: On March 9, 2023, defendant BEZIK received a  
27 \$15,000 wire transfer from NBA Holdings, LLC into a Comerica Bank  
28 account he controlled.

1       Overt Act No. 200: On April 7, 2023, defendant BEZIK received  
2 an \$18,500 wire transfer from NBA Holdings, LLC into a Comerica Bank  
3 account he controlled.

4       Overt Act No. 201: On May 3, 2023, defendant BEZIK received a  
5 \$47,000 wire transfer from NBA Holdings, LLC into a Comerica Bank  
6 account he controlled.

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1 COUNT TWO

2 [18 U.S.C. §§ 1959(a)(3), 2]

3 [DEFENDANTS ARTUNI, HAZRYAN, STEPANYAN, AND SEDANO]

4 27. On or about July 7, 2023, in Los Angeles County, within the  
5 Central District of California, defendants ARTUNI, HAZRYAN,  
6 STEPANYAN, and SEDANO, and others known and unknown to the Grand  
7 Jury, each aiding and abetting the others, for the purpose of  
8 maintaining and increasing position in the Artuni Enterprise, an  
9 enterprise engaged in racketeering activity, unlawfully and knowingly  
10 assaulted Victim 4 with a dangerous weapon and assaulted Victim 4  
11 resulting in serious bodily injury to Victim 4, in violation of  
12 California Penal Code Sections 245(a)(2) and 31.

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1 COUNT THREE

2 [18 U.S.C. §§ 1959(a)(5), 2]

3 [DEFENDANTS ARTUNI, HAZRYAN, STEPANYAN, AND SEDANO]

4 28. On or about July 7, 2023, in Los Angeles County, in the  
5 Central District of California, defendants ARTUNI, HAZRYAN,  
6 STEPANYAN, and SEDANO, and others known and unknown to the Grand  
7 Jury, each aiding and abetting the others, for the purpose of  
8 maintaining and increasing position in the Artuni Enterprise, an  
9 enterprise engaged in racketeering activity, attempted to murder  
10 Victim 4, in violation of California Penal Code Sections 664/187(a).

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1 COUNT FOUR

2 [18 U.S.C. §§ 1959(a)(5), 2]

3 [DEFENDANTS ARTUNI, HAZRYAN, STEPANYAN, AND SEDANO]

4 29. On or about July 7, 2023, in Los Angeles County, in the  
5 Central District of California, defendants ARTUNI, HAZRYAN,  
6 STEPANYAN, and SEDANO, and others known and unknown to the Grand  
7 Jury, each aiding and abetting the others, for the purpose of  
8 maintaining and increasing position in the Artuni Enterprise, an  
9 enterprise engaged in racketeering activity, attempted to murder  
10 Victim 5, in violation of California Penal Code Sections 664/187(a).

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1 COUNT FIVE

2 [18 U.S.C. § 1349]

3 [DEFENDANTS AGOPIAN, HAZRYAN, STEPANYAN, BEZIK, AND SEDANO]

4 A. THE OBJECTS OF THE CONSPIRACY

5 30. Beginning no later than July 8, 2015, and continuing to at  
6 least on or about December 2023, in Los Angeles County, within the  
7 Central District of California, and elsewhere, defendants AGOPIAN,  
8 HAZRYAN, STEPANYAN, BEZIK, and SEDANO, together with others known and  
9 unknown to the Grand Jury, conspired to commit:

10 a. Wire Fraud, in violation of Title 18, United States  
11 Code, Section 1343; and

12 b. Bank Fraud, in violation of Title 18, United States  
13 Code, Section 1344(1).

14 B. MANNER AND MEANS OF THE CONSPIRACY

15 31. The objects of the conspiracy were to be accomplished, in  
16 substance, as follows:

17 a. A co-conspirator ("CC-2") would incorporate Freedom At  
18 Enterprise, Inc. in the State of Pennsylvania and then reincorporate  
19 it in the State of California.

20 b. CC-2 would open a business checking account for  
21 Freedom At Enterprise, Inc. at JPMorgan Chase Bank, whose accounts  
22 were then insured by the Federal Deposit Insurance Corporation (the  
23 "Chase Bank Account"), designating CC-2 as the account owner.

24 c. Defendant HAZRYAN and CC-2 would maintain and control  
25 the Chase Bank Account.

26 d. Using the Chase Bank Account, defendant HAZRYAN and  
27 CC-2 would process credit card payments from willing participants,  
28 including defendants STEPANYAN and SEDANO, and others known and

1 unknown to the Grand Jury, to pay for purported moving services  
2 provided by Freedom At Enterprise, Inc. In reality, as defendants  
3 HAZRYAN, STEPANYAN, and SEDANO, CC-2, and the other cardholders knew,  
4 Freedom At Enterprise, Inc. provided no moving services, and the  
5 credit cards were used to transfer funds from the credit card issuers  
6 -- which were FDIC-insured -- into the Chase Bank Account.

7 e. Once credit card payments were made to the Chase Bank  
8 Account, defendants AGOPIAN, HAZRYAN, BEZIK, and SEDANO, CC-2, and  
9 others known and unknown to the Grand Jury, would drain the Chase  
10 Bank Account by (i) issuing checks, which were later deposited into  
11 different bank accounts or cashed; (ii) transferring the funds to a  
12 linked, external account; or (iii) wiring the money to an external  
13 account for the benefit of the co-conspirators and others.

14 f. To maintain the scheme and maximize its profitability,  
15 the cardholders would dispute the transactions with Freedom At  
16 Enterprise, Inc. with the credit card issuers in order to have the  
17 charges removed from their balances.

18 C. OVERT ACTS

19 32. In furtherance of the conspiracy and to accomplish its  
20 object, defendants AGOPIAN, HAZRYAN, STEPANYAN, BEZIK, and SEDANO,  
21 and others known and unknown to the Grand Jury, committed various  
22 overt acts in Los Angeles County, within the Central District of  
23 California, and elsewhere, including, but not limited to, Overt Acts  
24 99 to 161 of Count One of this Indictment, which are realleged here.

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1 COUNT SIX

2 [18 U.S.C. § 371]

3 [DEFENDANTS ARTUNI, AGOPIAN, KAZARYAN, AND BEZIK]

4 A. THE OBJECT OF THE CONSPIRACY

5 33. Beginning no later than on or about November 17, 2015, and  
6 continuing to at least in or around May 2023, within the Central  
7 District of California, and elsewhere, defendants ARTUNI, AGOPIAN,  
8 KAZARYAN, and BEZIK, conspired with each other and others known and  
9 unknown to the Grand Jury to commit Theft from Interstate and Foreign  
10 Shipment, in violation of Title 18, United States Code, Section 659.

11 B. MANNER AND MEANS OF THE CONSPIRACY

12 34. The object of the conspiracy was to be accomplished, in  
13 substance, as follows:

14 a. Defendant BEZIK would file Articles of Organization  
15 for Sierra Transportation Services, LLC as a limited liability  
16 company with the California Secretary of State.

17 b. A co-conspirator ("CC-5") would file an amendment to  
18 the Articles of Organization to change Sierra Transportation  
19 Services, LLC's name to NBA Holdings, LLC.

20 c. CC-5 would open two bank accounts with Bank of America  
21 for NBA Holdings, LLC, listing CC-5 as the account signer.

22 d. Defendant BEZIK would register NBA Holdings, LLC with  
23 Amazon.com, Inc. as a relay carrier and act as the administrator.

24 e. Using NBA Holdings, LLC, defendant BEZIK would obtain  
25 contracted freight routes from the Amazon Relay Board to transport  
26 goods purchased by Amazon from the manufacturers' designated  
27 distribution centers to Amazon-designated fulfillment or warehouse  
28 centers.

1                   f. Drivers, sometimes including defendant BEZIK himself,  
2 would pick the Amazon shipments up from the designated distribution  
3 centers but would not deliver them to the Amazon-designated  
4 fulfillment or warehouse centers. Instead, they would bring the  
5 goods to a "warehouse" maintained and controlled by defendant BEZIK  
6 and others known and unknown to the Grand Jury.

7                   g. Co-conspirators would enrich themselves by stealing  
8 and taking possession of the Amazon merchandise, valued at \$1,000 or  
9 more, which constituted an interstate and foreign shipment of freight  
10 and property, for both personal use and resale and profit.

11                  h. Defendant BEZIK would use one of the NBA Holdings, LLC  
12 Bank of America accounts to pay defendants ARTUNI, AGOPIAN, and  
13 KAZARYAN, himself, and others known and unknown to the Grand Jury,  
14 with the proceeds from the stolen Amazon goods.

15 C. OVERT ACTS

16                  35. In furtherance of the conspiracy and to accomplish its  
17 object, defendants ARTUNI, AGOPIAN, KAZARYAN, and BEZIK, and others  
18 known and unknown to the Grand Jury, committed various overt acts in  
19 Los Angeles County, within the Central District of California, and  
20 elsewhere, including, but not limited to, Overt Acts 162 to 201 as  
21 set forth in Count One of this Indictment, which are realleged and  
22 incorporated here.

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1 COUNT SEVEN

2 [18 U.S.C. § 922(g)(1)]

3 [DEFENDANTS STEPANYAN AND SEDANO]

4 36. Beginning on a date unknown and continuing until on or  
5 about December 12, 2023, defendants STEPANYAN and SEDANO knowingly  
6 possessed firearms and ammunition, each in and affecting interstate  
7 and foreign commerce, including, but not limited to, the following:

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1 **Firearms**

2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Make	Model	Caliber	Type	Serial No.																
Stag Arms	STAG-15	5.56mm	Rifle	110979																
Century Arms	C39v2	7.62x39mm	Rifle	C39P2A01084																
Izhmash	Saiga	.223 Remington	Rifle	H04161419																
Ruger	American	6.5 Creedmoor	Rifle	690876968																
Glock	23	.40	Pistol	LLM670																
Charter Arms	Bulldog	.44 SPL	Revolver	22C03482																
Glock	20	10mm Auto	Pistol	BNAV439																
Taurus	G3	9x19mm	Pistol	AAL034433																
Glock	29 Gen4	10mm Auto	Pistol	BRRT964																
Glock	43X	9x19mm	Pistol	BLUA713																
CZ	P-10S	9x19mm	Pistol	UC11926																
Taurus	605	.357 Magnum	Revolver	TI62464																
Ruger	LCP	.380 Auto	Pistol	371851421																
Glock	21	.45 Auto	Pistol	KDK598																
Glock	17L	9x19mm	Pistol	NA436																
S/S Inc.	Street Sweeper	12 gauge	Shotgun/Destructive Device	SH1292																

22 **Ammunition**

23	24	25	26	27	28	No. of Rounds	Make	Caliber
10							FN Herstal/Fiocchi	5.7x28mm
21							FN Herstal/Fiocchi	5.7x28mm
150							FN Herstal/Fiocchi	5.7x28mm
77							Barnaul Cartridge Works	9mm Luger

1	59	Sig Sauer	.380 Auto
2	19	Hornady	7.62x39mm
3	39	Hornady	.357 Magnum
4	11	Hornady	9mm Luger
5	7	Hornady	.45 Auto
6	25	Hornady	.38 Special
7	1	Federal Cartridge Company-CCI/Speer	.45 Auto +P
8	50	Fiocchi	.380 Auto
9	6	205 <sup>th</sup> Arsenal	.223 Remington
10	8	Ammo Incorporated/ Jagemann	9mm Luger
11	8	Sellier & Bellot	9x19mm
12	26	Remington	.22 short
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15       37. Defendant STEPANYAN possessed such firearms and ammunition  
16 knowing that he had previously been convicted of at least one of the  
17 following felony crimes, each punishable by a term of imprisonment  
18 exceeding one year:

19           a. Identity Theft, in violation of California Penal Code  
20 Section 530.5(a), in the Superior Court of the State of California,  
21 County of Los Angeles, Case Number GA063152, on or about November 15,  
22 2005;

23           b. Use Access Account Info without Consent, in violation  
24 of California Penal Code Section 484E(d), in the Superior Court of  
25 the State of California, County of Los Angeles, Case Number GA063152,  
26 on or about November 15, 2005;

27           c. Forge Official Seal, in violation of California Penal  
28 Code Section 472, in the Superior Court of the State of California,

1 County of Los Angeles, Case Number GA063152, on or about November 15,  
2 2005;

3 d. Possession of a Controlled Substance, in violation of  
4 California Health and Safety Code Section 11350(b), in the Superior  
5 Court of the State of California, County of Los Angeles, Case Number  
6 GA063152, on or about November 15, 2005;

7 e. Possess Concentrated Cannabis, in violation of  
8 California Health and Safety Code Section 11357(a), in the Superior  
9 Court of the State of California, County of Los Angeles, Case Number  
10 GA063152, on or about November 15, 2005;

11 f. Possession of a Narcotic Controlled Substance, in  
12 violation of California Health and Safety Code Section 11350(a), in  
13 the Superior Court of the State of California, County of Los Angeles,  
14 Case Number GA068681, on or about February 23, 2007;

15 g. Possession of a Narcotic Controlled Substance, in  
16 violation of California Health and Safety Code Section 11350(a), in  
17 the Superior Court of the State of California, County of Los Angeles,  
18 Case Number GA068258, on or about February 23, 2007;

19 h. Grand Theft, in violation of California Penal Code  
20 Section 487(a), in the Superior Court of the State of California,  
21 County of Los Angeles, Case Number GA068855, on or about March 12,  
22 2007;

23 i. Petty Theft with a Prior Conviction, in violation of  
24 California Penal Code Section 666, in the Superior Court of the State  
25 of California, County of Los Angeles, Case Number GA068855, on or  
26 about March 12, 2007;

27 j. Petty Theft with a Prior Conviction, in violation of  
28 California Penal Code Section 666, in the Superior Court of the State

1 of California, County of Los Angeles, Case Number GA069586, on or  
2 about July 3, 2007;

3                   k. Possession of a Narcotic Controlled Substance, in  
4 violation of California Health and Safety Code Section 11350(a), in  
5 the Superior Court of the State of California, County of Los Angeles,  
6 Case Number GA069586, on or about July 3, 2007;

7                   l. Grand Theft, in violation of California Penal Code  
8 Section 487(a), in the Superior Court of the State of California,  
9 County of Los Angeles, Case Number GA075549, on or about November 13,  
10 2009;

11                   m. Possession of a Narcotic Controlled Substance, in  
12 violation of California Health and Safety Code Section 11350(a), in  
13 the Superior Court of the State of California, County of Los Angeles,  
14 Case Number GA075379, on or about January 13, 2009;

15                   n. Transport/Sell Narcotic Controlled Substance, in  
16 violation of California Health and Safety Code Section 11352(a), in  
17 the Superior Court of the State of California, County of Los Angeles,  
18 Case Number GA086911, on or about October 3, 2012;

19                   o. Possession for Sale of a Narcotic Controlled  
20 Substance, in violation of California Health and Safety Code Section  
21 11351, in the Superior Court of the State of California, County of  
22 Los Angeles, Case Number GA086911, on or about October 3, 2012;

23                   p. Possess Controlled Substance while Armed, in violation  
24 of California Health and Safety Code Section 11370.1(a), in the  
25 Superior Court of the State of California, County of Los Angeles,  
26 Case Number GA086911, on or about October 3, 2012;

27                   q. Felon in Possession of a Firearm, in violation of  
28 California Penal Code Section 29800(a)(1), in the Superior Court of

1 the State of California, County of Los Angeles, Case Number GA086911,  
2 on or about October 3, 2012;

3                   r. Felon in Possession of Ammunition, in violation of  
4 California Penal Code Section 30305(a)(1), in the Superior Court of  
5 the State of California, County of Los Angeles, Case Number GA086911,  
6 on or about October 3, 2012;

7                   s. Possess Controlled Substance, in violation of  
8 California Health and Safety Code Section 11377(a), in the Superior  
9 Court of the State of California, County of Los Angeles, Case Number  
10 GA086911, on or about October 3, 2012;

11                  t. Hit and Run: Death or Injury, in violation of  
12 California Vehicle Code Section 20001(a), in the Superior Court of  
13 the State of California, County of Los Angeles, Case Number GA087498,  
14 on or about October 3, 2012;

15                  u. Receiving a Stolen Vehicle, in violation of California  
16 Penal Code Section 496D(a), in the Superior Court of the State of  
17 California, County of Los Angeles, Case Number GA087498, on or about  
18 October 3, 2012; and

19                  v. Taking a Vehicle Without Consent, in violation of  
20 California Vehicle Code Section 10851(a), in the Superior Court of  
21 the State of California, County of Los Angeles, Case Number GA087498,  
22 on or about October 3, 2012.

23                  38. Defendant SEDANO possessed such firearms and ammunition  
24 knowing that he had previously been convicted of at least one of the  
25 following felony crimes, each punishable by a term of imprisonment  
26 exceeding one year:

27                   a. Vandalism, in violation of California Penal Code  
28 Section 594(a), in the Superior Court of the State of California,

1 County of Los Angeles, Case Number GA069370, on or about May 17,  
2 2007;

3                   b. Robbery, in violation of California Penal Code Section  
4 211, in the Superior Court of the State of California, County of Los  
5 Angeles, Case Number LA057979, on or about February 29, 2008; and

6                   c. Vandalism, in violation of California Penal Code  
7 Section 594(a) with Gang Enhancement, in the Superior Court of the  
8 State of California, County of Los Angeles, Case Number GA081658, on  
9 or about February 23, 2011.

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1 COUNT EIGHT

2 [18 U.S.C. § 922(g)(1)]

3 [DEFENDANT MANUKYAN]

4 39. Beginning on a date unknown and continuing until on or  
5 about December 12, 2023, defendant MANUKYAN knowingly possessed  
6 firearms, namely, a Ruger, model 10/22, .22 LR caliber rifle, bearing  
7 serial number 129-54711; a United States Carbine, model M1, .30  
8 Carbine caliber rifle, bearing serial number AA33192; and a Sears,  
9 Roebuck and Co., model 300, 20 gauge shotgun, bearing serial number  
10 Q118168, each in and affecting interstate and foreign commerce.

11 40. Defendant MANUKYAN possessed such firearms knowing that he  
12 had previously been convicted of at least one of the following felony  
13 crimes, each punishable by a term of imprisonment exceeding one year:

14 a. Identity Theft, in violation of California Penal Code  
15 Section 530.5(a), in the Superior Court of the State of California,  
16 County of Los Angeles, Case Number GA089554, on or about January 9,  
17 2014;

18 b. Receiving Stolen Property, in violation of California  
19 Penal Code Section 496(a), in the Superior Court of the State of  
20 California, County of Los Angeles, Case Number GA089554, on or about  
21 January 9, 2014; and

22 c. Prohibited Person in Possession of Ammunition, in  
23 violation of California Penal Code Section 30305(a)(1), in the  
24 Superior Court of the State of California, County of Los Angeles,  
25 Case Number GA111641, on or about February 14, 2023.

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1 COUNT NINE

2 [18 U.S.C. § 922(g)(1)]

3 [DEFENDANT ARAKELYAN]

4 41. Beginning on a date unknown and continuing until on or  
5 about December 12, 2023, defendant ARAKELYAN knowingly possessed  
6 firearms, namely, a Glock, model 29 Gen4, 10mm Auto caliber pistol,  
7 bearing serial number BRRT964, and a Taurus, model G3, 9x19mm caliber  
8 pistol, bearing serial number AAL034433, each in and affecting  
9 interstate and foreign commerce.

10 42. Defendant ARAKELYAN possessed such firearms knowing that he  
11 had previously been convicted of at least one of the following felony  
12 crimes, each punishable by a term of imprisonment exceeding one year:

13 a. Discharging a Firearm into an Inhabited Dwelling or  
14 Occupied Vehicle, in violation of California Penal Code Section 246,  
15 in the Superior Court of the State of California, County of Los  
16 Angeles, Case Number GA046510, on or about February 6, 2003;

17 b. Distribution of Methamphetamine, in violation of Title  
18 21, United States Code, Section 841(a)(1), (b)(1)(A), in United States  
19 District Court, Eastern District of Pennsylvania, Case Number 2:06-  
20 cr-00226-AB-4, on or about October 6, 2008;

21 c. Unlawful Use of a Communication Facility, in violation  
22 of Title 21, United States Code Section 843(b), in United States  
23 District Court, Eastern District of Pennsylvania, Case Number 2:06-  
24 cr-00226-AB-4, on or about October 6, 2008;

25 d. Conspiracy to Distribute and Possess with Intent to  
26 Distribute Methamphetamine, in violation of Title 21, United States  
27 Code, Sections 846, 841(a)(1), (b)(1)(A), in United States District

1 Court, Eastern District of Pennsylvania, Case Number 2:06-cr-00401-AB-  
2 1, on or about October 6, 2008; and

3 e. Ownership or Possession of Firearm by Prohibited  
4 Person, in violation of Nevada Revised Statute 202.360.1, in the  
5 District Court of the State of Nevada, County of Clark, Case Number  
6 C-20-352231-1, on or about February 13, 2023.

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1 COUNT TEN

2 [18 U.S.C. § 922(g)(1)]

3 [DEFENDANT AGOPIAN]

4 43. Beginning on a date unknown and continuing until on or  
5 about April 11, 2025, defendant AGOPIAN, knowingly possessed firearms  
6 and ammunition, namely, a Kel-Tec, model KSG, 12 gauge shotgun,  
7 bearing serial number XXC224; a Kimber, model Custom TLE II, .45 ACP  
8 caliber pistol, bearing serial number K707215; approximately 12  
9 rounds of Winchester 12 gauge shotgun shells; and approximately seven  
10 rounds of Federal Cartridge Company .45 Auto caliber ammunition, each  
11 in and affecting interstate and foreign commerce.

12 44. Defendant AGOPIAN possessed such firearms and ammunition  
13 knowing that he had previously been convicted of at least one of the  
14 following felony crimes, each punishable by a term of imprisonment  
15 exceeding one year:

16 a. Grand Larceny in the Third Degree, in violation of New  
17 York Penal Law Section 155.35, in the Supreme Court of the State of  
18 New York, County of New York, Case Number 04780-2014, on or about,  
19 October 30, 2014; and

20 b. Possession of a Forged Instrument in the Second  
21 Degree, in violation of New York Penal Law Section 170.25, in the  
22 Supreme Court of the State of New York, County of New York, Case  
23 Number 04780-2014, on or about, October 30, 2014.

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1 COUNT ELEVEN

2 [18 U.S.C. § 922(g)(5)(A)]

3 [DEFENDANT ARAKELYAN]

4 45. Beginning on a date unknown, and continuing until on or  
5 about December 12, 2023, in Los Angeles County, within the Central  
6 District of California, defendant ARAKELYAN knowingly possessed  
7 firearms, namely, a Glock, model 29 Gen4, 10mm Auto caliber pistol,  
8 bearing serial number BRRT964 and a Taurus, model G3, 9x19mm caliber  
9 pistol, bearing serial number AAL034433, each in and affecting  
10 interstate and foreign commerce.

11 46. Defendant ARAKELYAN possessed such firearms knowing that he  
12 was then an alien illegally and unlawfully in the United States.

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1 COUNT TWELVE

2 [18 U.S.C. §§ 922(o)(1), 2]

3 [DEFENDANTS STEPANYAN AND SEDANO]

4 47. Beginning on a date unknown and continuing until on or  
5 about December 12, 2023, in Los Angeles County, within the Central  
6 District of California, defendants STEPANYAN and SEDANO, and others  
7 known and unknown to the Grand Jury, each aiding and abetting the  
8 others, knowingly possessed, and caused to be possessed, machineguns,  
9 as defined in Title 18, United States Code, Section 921(a)(24) and  
10 Title 26, United States Code, Section 5845(b), namely, the following  
11 items that were designed and intended solely and exclusively for use  
12 in converting a weapon into a machinegun: a 3D-printed machinegun  
13 conversion device; an auto sear attached to a Glock, model 21, .45  
14 Auto caliber firearm; and an auto sear attached to a Glock, model  
15 17L, 9x19mm Luger caliber firearm, which defendants STEPANYAN and  
16 SEDANO knew to be machineguns.

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1 COUNT THIRTEEN THROUGH EIGHTEEN

2 [26 U.S.C. § 5861(d) ]

3 [DEFENDANTS STEPANYAN AND SEDANO]

4 48. Beginning on a date unknown and continuing until on or  
5 about December 12, 2023, in Los Angeles County, within the Central  
6 District of California, defendants STEPANYAN and SEDANO knowingly  
7 possessed the following firearms, each of which defendants STEPANYAN  
8 and SEDANO knew to be a firearm, a short-barreled rifle, and a  
9 firearm silencer, as defined in Title 26, United States Code, Section  
10 5845(a)(3), (a)(7), and (c), and Title 18, United States Code,  
11 Section 921(a)(25), and which had not been registered to defendants  
12 STEPANYAN or SEDANO in the National Firearms Registration and  
13 Transfer Record, as required by Chapter 53, Title 26, United States  
14 Code:

COUNT	DESCRIPTION
17 THIRTEEN	A firearm silencer bearing no legitimate manufacturer's mark or serial number
19 FOURTEEN	A firearm silencer bearing no legitimate manufacturer's mark or serial number
20 FIFTEEN	A firearm silencer bearing no legitimate manufacturer's mark or serial number
22 SIXTEEN	A firearm silencer bearing no legitimate manufacturer's mark or serial number
23 SEVENTEEN	A S/S Inc., Street Sweeper, 12 gauge shotgun/destructive device, bearing serial number SH1292
25 EIGHTEEN	An AR-Style short-barreled rifle bearing no legitimate manufacturer's mark or serial number (commonly referred to as a "ghost gun")

1 COUNT NINETEEN THROUGH TWENTY-THREE

2 [26 U.S.C. § 5861(i)]

3 [DEFENDANTS STEPANYAN AND SEDANO]

4 49. Beginning on a date unknown and continuing until on or  
5 about December 12, 2023, in Los Angeles County, within the Central  
6 District of California, defendants STEPANYAN and SEDANO knowingly  
7 possessed the following firearms, each of which defendants STEPANYAN  
8 and SEDANO knew to be a firearm, a short-barreled rifle, and a  
9 firearm silencer, as defined in Title 26, United States Code, Section  
10 5845(a)(3), (a)(7), and (c), and Title 18, United States Code,  
11 Section 921(a)(25), and which did not bear a serial number, as  
12 required by Chapter 53, Title 26, United States Code.

COUNT	DESCRIPTION
NINETEEN	A firearm silencer bearing no legitimate manufacturer's mark or serial number
TWENTY	A firearm silencer bearing no legitimate manufacturer's mark or serial number
TWENTY-ONE	A firearm silencer bearing no legitimate manufacturer's mark or serial number
TWENTY-TWO	A firearm silencer bearing no legitimate manufacturer's mark or serial number
TWENTY-THREE	An AR-Style short-barreled rifle bearing no legitimate manufacturer's mark or serial number (commonly referred to as a "ghost gun")

1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 1963]

3 1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice  
4 is hereby given that the United States of America will seek  
5 forfeiture as part of any sentence, pursuant to Title 18, United  
6 States Code, Section 1963, in the event of any defendant's conviction  
7 of the offense set forth in Count One of this Indictment.

8 2. Any defendant so convicted shall forfeit to the United  
9 States of America the following:

10 (a) Any interest the convicted defendant has acquired or  
11 maintained as a result of the offense;

12 (b) Any interest in, security of, claim against, or  
13 property or contractual right of any kind affording a source or  
14 influence over, any enterprise which the convicted defendant has  
15 established, operated, controlled, conducted, or participated in the  
16 conduct of, as a result of the offense;

17 (c) Any property constituting, or derived from, any  
18 proceeds which the person obtained, directly or indirectly, from  
19 racketeering activity or unlawful debt collection as a result of the  
20 offense; and

21 (d) To the extent such property is not available for  
22 forfeiture, a sum of money equal to the total value of the property  
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 18, United States Code, Section 1963(m),  
25 any defendant so convicted shall forfeit substitute property, up to  
26 the total value of the property described in the preceding paragraph  
27 if, as the result of any act or omission of said defendant, the  
28 property described in the preceding paragraph, or any portion thereof

1 (a) cannot be located upon the exercise of due diligence; (b) has  
2 been transferred, sold to or deposited with a third party; (c) has  
3 been placed beyond the jurisdiction of the court; (d) has been  
4 substantially diminished in value; or (e) has been commingled with  
5 other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 18 U.S.C. §§ 981(a)(1)(C), 924(d) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Sections 981(a)(1)(C), 924(d), and Title 28,  
7 United States Code, Section 2461(c), in the event of any defendant's  
8 conviction of the offenses set forth in Counts Two through Four of  
9 this Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 (a) All right, title, and interest in any and all  
13 property, real or personal, constituting, or derived from, any  
14 proceeds traceable to the offenses;

15 (b) All right, title, and interest in any firearm or  
16 ammunition involved in or used in any such offense; and

17 (c) To the extent such property is not available for  
18 forfeiture, a sum of money equal to the total value of the property  
19 described in subparagraphs (a) and (b).

20 3. Pursuant to Title 21, United States Code, Section 853(p),  
21 as incorporated by Title 28, United States Code, Section 2461(c), any  
22 defendant so convicted shall forfeit substitute property, up to the  
23 value of the property described in the preceding paragraph if, as the  
24 result of any act or omission of said defendant, the property  
25 described in the preceding paragraph or any portion thereof (a)  
26 cannot be located upon the exercise of due diligence; (b) has been  
27 transferred, sold to, or deposited with a third party; (c) has been

1 placed beyond the jurisdiction of the court; (d) has been  
2 substantially diminished in value; or (e) has been commingled with  
3 other property that cannot be divided without difficulty.

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1 FORFEITURE ALLEGATION THREE

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 982(a)(2), in the event of any  
7 defendant's conviction of the offense set forth in Count Five of this  
8 Indictment.

9 2. Any defendant so convicted shall forfeit to the United  
10 States of America the following:

11 (a) All right, title and interest in any and all property,  
12 real or personal, constituting, or derived from, any proceeds  
13 obtained, directly or indirectly, as a result of the offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p), as  
18 incorporated by Title 18, United States Code, Section 982(b), any  
19 defendant so convicted shall forfeit substitute property, up to the  
20 total value of the property described in the preceding paragraph if,  
21 as the result of any act or omission of said defendant, the property  
22 described in the preceding paragraph, or any portion thereof: (a)  
23 cannot be located upon the exercise of due diligence; (b) has been  
24 transferred, sold to or deposited with a third party; (c) has been  
25 placed beyond the jurisdiction of the court; (d) has been  
substantially diminished in value; or (e) has been commingled with  
other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION FOUR

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 981(a)(1)(C) and Title 28, United States  
7 Code, Section 2461(c), in the event of any defendant's conviction of  
8 the offense set forth in Count Six of this Indictment.

9 2. Any defendant so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title and interest in any and all property,  
12 real or personal, constituting, or derived from, any proceeds  
13 traceable to the offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p), as  
18 incorporated by Title 28, United States Code, Section 2461(c), any  
19 defendant so convicted shall forfeit substitute property, up to the  
20 total value of the property described in the preceding paragraph if,  
21 as the result of any act or omission of said defendant, the property  
22 described in the preceding paragraph, or any portion thereof: (a)  
23 cannot be located upon the exercise of due diligence; (b) has been  
24 transferred, sold to or deposited with a third party; (c) has been  
25 placed beyond the jurisdiction of the court; (d) has been  
26 substantially diminished in value; or (e) has been commingled with  
27 other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION FIVE

2 [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 924(d)(1), and Title 28, United States  
7 Code, Section 2461(c), in the event of any defendant's conviction of  
8 the offenses set forth in any of Counts Seven through Twelve of this  
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 (a) All right, title, and interest in any firearm or  
13 ammunition involved in or used in any such offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),  
18 as incorporated by Title 28, United States Code, Section 2461(c), any  
19 defendant so convicted, shall forfeit substitute property, up to the  
20 value of the property described in the preceding paragraph if, as the  
21 result of any act or omission of said defendant, the property  
22 described in the preceding paragraph or any portion thereof (a)  
23 cannot be located upon the exercise of due diligence; (b) has been  
24 transferred, sold to, or deposited with a third party; (c) has been  
25 placed beyond the jurisdiction of the court; (d) has been  
26 substantially diminished in value; or (e) has been commingled with  
27 other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION SIX

2 [26 U.S.C. § 5872, and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 26,  
6 United States Code, Section 5872 and Title 28, United States Code,  
7 Section 2461(c), in the event of any defendant's conviction of the  
8 offense set forth in any of Counts Thirteen through Twenty-Three of  
9 this Indictment.

10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 (a) All right, title, and interest in any firearm  
13 involved in any such offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section  
18 853(p), as incorporated by Title 28, United States Code, Section  
19 2461(c), any defendant so convicted, shall forfeit substitute  
20 property, up to the value of the property described in the preceding  
21 paragraph if, as the result of any act or omission of the defendant,  
22 the property described in the preceding paragraph or any portion  
23 thereof (a) cannot be located upon the exercise of due diligence; (b)  
24 has been transferred, sold to, or deposited with a third party; (c)

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1 has been placed beyond the jurisdiction of the court; (d) has been  
2 substantially diminished in value; or (e) has been commingled with  
3 other property that cannot be divided without difficulty.

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5 A TRUE BILL

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7 /S/  
8 Foreperson

9 BILAL A. ESSAYLI  
10 United States Attorney

11 *Christina Shay*

12 CHRISTINA T. SHAY  
13 Assistant United States Attorney  
Chief, Criminal Division

14 JOSHUA O. MAUSNER  
15 Assistant United States Attorney  
Chief, Violent & Organized Crime  
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16 LYNDSI ALLSOP  
17 Assistant United States Attorney  
18 Deputy Chief, Violent & Organized  
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19 KENNETH R. CARBAJAL  
20 Assistant United States Attorney  
Violent & Organized Crime Section

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